

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 05-10131-JLT
	)	
ANGELO MARTIGNETTI	)	
	)	
	)	

**ASSENTED-TO MOTION TO EXCLUDE TIME**

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, and Assistant U.S. Attorney Allison D. Burroughs, hereby moves, with the assent of defense counsel, that this Court enter an Order excluding the period of time between and including July 19, 2005 and September 14, 2005, from the computation of the time within which a trial must be held in this matter pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(C) and Local Rule 112.2.

The parties agree that the period of time between the initial status conference held on July 19, 2005, and the interim status conference now scheduled for September 14, 2005, should be excluded from the computation of time within which a trial must be held because the government and defense counsel need additional time to negotiate a possible plea agreement in the case. The ends of justice thus are served by excluding that time period.

Accordingly, the parties request that this Court enter an Order excluding the time period set forth above from the

computation of the time within which a trial must be held in this matter under 18 U.S.C. § 3161(c).

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/ Allison D. Burroughs  
ALLISON D. BURROUGHS  
Assistant U.S. Attorney

**So Ordered**, this \_\_\_\_ day of \_\_\_\_, 2005

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MARIANNE B. BOWLER  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served upon defense counsel, C. Michael Clifford, a copy of the foregoing document by electronic filing with the District Court on this 20<sup>th</sup> day of July, 2005.

/s/ Allison D. Burroughs  
ALLISON D. BURROUGHS  
Assistant U. S. Attorney